USDA

Privacy Impact Assessment (PIA)

Electronic Distribution of Disbursement Data (ED3)

Revision: *1.03*

FSA
FARM SERVICE AGENCY

Farm Service Agency

Date: *July 27, 2009*

Document Information

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Document Revision and History			
Revision	Date	Author	Comments
1.01	July 6, 2009	Scott Tanos	*Initial version*
1.02	July 7, 2009	Scott Tanos	Populated sections 3, 4, and 5 from previous PIA
1.02	July 27, 2009	CSO	Reviewed and Updated
1.03	July 27, 2009	D.Brizendine	Updated responses for 24, 25, 26, 26.1; document review

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1 Purpose of Document

USDA DM 3515-002 states: "Agencies are responsible for initiating the PIA in the early stages of the development of a system and to ensure that the PIA is completed as part of the required System Life Cycle (SLC) reviews. Systems include data from applications housed on mainframes, personal computers, and applications developed for the Web and agency databases. Privacy must be considered when requirements are being analyzed and decisions are being made about data usage and system design. This applies to all of the development methodologies and system life cycles used in USDA.

Both the system owners and system developers must work together to complete the PIA. System owners must address what data are used, how the data are used, and who will use the data. System owners also need to address the privacy implications that result from the use of new technologies (e.g., caller identification). The system developers must address whether the implementation of the owner's requirements presents any threats to privacy."

The Privacy Impact Assessment (PIA) document contains information on how the **Electronic Distribution of Disbursement Data (ED3)** affects the privacy of its users and the information stored within. This assessment is in accordance with NIST SP 800-37 *Guide for the Security Certification and Accreditation of Federal Information Systems.*

2 System Information

System Information	
Agency:	Farm Service Agency
System Name:	Electronic Distribution of Disbursement Data
System Type:	☒ Major Application ☐ General Support System ☐ Non-major Application
System Categorization (per FIPS 199):	☐ High ☒ Moderate ☐ Low
Description of System:	The Electronic Distribution of Disbursement and Invoicing Data (ED3) system provides a method for three USDA/FSA systems, currently supported by the Fund and Commodity Management Office (FCMO), to electronically transmit and collect information via the Internet. Disbursement data from the Processed Commodities Inventory Management System (PCIMS), Grain Inventory Management System (GIMS), and Centralized Disbursements System (CDS) is consolidated and made available on the Web immediately after payments are transmitted and certified. The ACH (Automated Clearing House) payees need to receive their disbursement statements as soon as possible after payment is made to allow them to identify their deposits, perform reconciliation activities, and distribute their money on a timelier basis. ED3 also has Storage Invoicing functionality. Previously, invoices were generated and mailed to the warehouse operator. The warehouse operator would review the invoice, sign the invoice certifying the information was correct and return the certification page to FCMO by mail. Once received, FCMO personnel would update the system indicating the invoice had been certified and release it for payment. In ED3, the warehouse operator receives an e-mail notification when the invoice is ready for review. The warehouse operator reviews the invoice and certifies the invoice by entering their password.
Who owns this system? (Name, agency, contact information)	Khristy Baughman (816)926-1200 Khristy.Baughman@kcc.usda.gov

System Information	
Who is the security contact for this system? (Name, agency, contact information)	Brian Davies Information System Security Program Manager (ISSPM) U.S. Department of Agriculture Farm Service Agency 1400 Independence Avenue SW Washington, D.C. 20250 (202) 720-2419 Brian.Davies@wdc.usda.gov
Who completed this document? (Name, agency, contact information)	Kathy Winburn (816) 926-1924 kathy.winburn@kcc.usda.gov

3 Data Information

3.1 Data Collection

No.	Question	Response
1	Generally describe the data to be used in the system.	Customer: Taxpayer Identification Number; bank account number; business name; business payee address for disbursements; business mailing and location address for storage invoices; contact name, phone number and email address. Contains business information only no personnel information. Employee: Phone number, FAX number, and authorized access information such as name, access ID, work phone number, and email addresses
2	Does the system collect Social Security Numbers (SSNs) or Taxpayer Identification Numbers (TINs)?	☐ Yes ☒ No – If NO, go to question 3.
2.1	State the law or regulation that requires the collection of this information.	

No.	Question	Response
3	Is the use of the data both relevant and necessary to the purpose for which the system is being designed? In other words, the data is absolutely needed and has significant and demonstrable bearing on the system's purpose as required by statute or by Executive order of the President.	☒ Yes ☐ No
4	Sources of the data in the system.	The customer provides contact name, phone number, and email address when registering. All other data comes from PCIMS, GIMS, CDS, SCIMS.
4.1	What data is being collected from the customer?	ED3 does not actually collect data . PCIMS GIMS, and CDS supplies ED3 with the following information - Taxpayer Identification Number; bank account number; business name; business payee address for disbursements; business mailing and location address for storage invoices; contact name, phone number and email address. Contains business information only no personnel information
4.2	What USDA agencies are providing data for use in the system?	USDA/FSA
4.3	What state and local agencies are providing data for use in the system?	None
4.4	From what other third party sources is data being collected?	Vendors, carriers, warehousemen, producers.
5	Will data be collected from sources outside your agency? For example, customers, USDA sources (i.e., NFC, RD, etc.) or Non-USDA sources.	☐ Yes ☒ No – If NO, go to question 6.
5.1	How will the data collected from customers be verified for accuracy, relevance, timeliness, and completeness?	
5.2	How will the data collected from USDA sources be verified for accuracy, relevance, timeliness, and completeness?	
5.3	How will the data collected from non-USDA sources be verified for accuracy, relevance, timeliness, and completeness?	

3.2 Data Use

No.	Question	Response
6	Individuals must be informed in writing of the principal purpose of the information being collected from them. What is the principal purpose of the data being collected?	Disbursement data from the Processed Commodities Inventory Management System (PCIMS), Grain Inventory Management System (GIMS), and Centralized Disbursements System (CDS) is consolidated and made available on the Web immediately after payments are transmitted and certified.
7	Will the data be used for any other purpose?	☐ Yes ☒ No – If NO, go to question 8.
7.1	What are the other purposes?	
8	Is the use of the data both relevant and necessary to the purpose for which the system is being designed? In other words, the data is absolutely needed and has significant and demonstrable bearing on the system's purpose as required by statute or by Executive order of the President	☒ Yes ☐ No
9	Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected (i.e., aggregating farm loans by zip codes in which only one farm exists.)?	☐ Yes ☒ No – If NO, go to question 10.
9.1	Will the new data be placed in the individual's record (customer or employee)?	☐ Yes ☐ No
9.2	Can the system make determinations about customers or employees that would not be possible without the new data?	☐ Yes ☐ No
9.3	How will the new data be verified for relevance and accuracy?	
10	Individuals must be informed in writing of the routine uses of the information being collected from them. What are the intended routine uses of the data being collected?	To contact users with information on Disbursements and Storage Invoices.
11	Will the data be used for any other uses (routine or otherwise)?	☐ Yes ☒ No – If NO, go to question 12.
11.1	What are the other uses?	

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No.	Question	Response
12	Automation of systems can lead to the consolidation of data – bringing data from multiple sources into one central location/system – and consolidation of administrative controls. When administrative controls are consolidated, they should be evaluated so that all necessary privacy controls remain in place to the degree necessary to continue to control access to and use of the data. Is data being consolidated?	☒ Yes ☐ No – If NO, go to question 13.
12.1	What controls are in place to protect the data and prevent unauthorized access?	User's access is restricted by role-based internal access security controls within the application
13	Are processes being consolidated?	☒ Yes ☐ No – If NO, go to question 14.
13.1	What controls are in place to protect the data and prevent unauthorized access?	User's access is restricted by role-based internal access security controls within the application

3.3 Data Retention

No.	Question	Response
14	Is the data periodically purged from the system?	☒ Yes ☐ No – If NO, go to question 15.
14.1	How long is the data retained whether it is on paper, electronic, in the system or in a backup?	Data is retained for 10 years
14.2	What are the procedures for purging the data at the end of the retention period?	According to NITC policy and procedures
14.3	Where are these procedures documented?	NITC
15	While the data is retained in the system, what are the requirements for determining if the data is still sufficiently accurate, relevant, timely, and complete to ensure fairness in making determinations?	The customer maintains his or her own contact name, phone number, and email address. The TIN, bank account info, and all addresses come from the legacy feeder systems (PCIMS, GIMS, CDS, and SCIMS). Employee names, phone and fax numbers, and emails are maintained by the administrative users.

No.	Question	Response
16	Is the data retained in the system the minimum necessary for the proper performance of a documented agency function?	☒ Yes ☐ No

3.4 Data Sharing

No.	Question	Response
17	Will other agencies share data or have access to data in this system (i.e., international, federal, state, local, other, etc.)?	☐ Yes ☒ No – If NO, go to question 18.
17.1	How will the data be used by the other agency?	
17.2	Who is responsible for assuring the other agency properly uses the data?	
18	Is the data transmitted to another agency or an independent site?	☐ Yes ☒ No – If NO, go to question 19.
18.1	Is there appropriate agreement in place to document the interconnection and ensure the PII and/or Privacy Act data is appropriately protected?	
19	Is the system operated in more than one site?	☐ Yes ☒ No – If NO, go to question 20.
19.1	How will consistent use of the system and data be maintained in all sites?	

3.5 Data Access

No.	Question	Response
20	Who will have access to the data in the system (i.e., users, managers, system administrators, developers, etc.)?	Production update: Customers, internal users, System Administrators. Production inquiry: Developers. Test update/inquiry: Internal users, System Administrators, and developers
21	How will user access to the data be determined?	Access is determined by Internal Controls
21.1	Are criteria, procedures, controls, and responsibilities regarding user access documented?	☒ Yes ☐ No

No.	Question	Response
22	How will user access to the data be restricted?	Restricted by user ID; access determined by manager through KC-390
22.1	Are procedures in place to detect or deter browsing or unauthorized user access?	☒ Yes ☐ No
23	Does the system employ security controls to make information unusable to unauthorized individuals (i.e., encryption, strong authentication procedures, etc.)?	☒ Yes ☐ No

3.6 Customer Protection

No.	Question	Response
24	Who will be responsible for protecting the privacy rights of the customers and employees affected by the interface (i.e., office, person, departmental position, etc.)?	USDA Privacy Office
25	How can customers and employees contact the office or person responsible for protecting their privacy rights?	By contacting John Underwood, Privacy Officer, at john.underwood@kcc.usda.gov & 816.926.6992
26	A "breach" refers to a situation where data and/or information assets are unduly exposed. Is a breach notification policy in place for this system?	☒ Yes – If YES, go to question 27. Common FSA incident reporting process. ☐ No
26.1	If NO, please enter the Plan of Action and Milestones (POA&M) number with the estimated completion date.	
27	Consider the following: Consolidation and linkage of files and systems Derivation of data Accelerated information processing and decision making Use of new technologies Is there a potential to deprive a customer of due process rights (fundamental rules of fairness)?	☐ Yes ☒ No – If NO, go to question 28.
27.1	Explain how this will be mitigated?	

No.	Question	Response
28	How will the system and its use ensure equitable treatment of customers?	In accordance with law, rules and regulations
29	Is there any possibility of treating customers or employees differently based upon their individual or group characteristics?	☐ Yes ☒ No – If NO, go to question 30
29.1	Explain	

4 System of Record

No.	Question	Response
30	Can the data be retrieved by a personal identifier? In other words, does the system actually retrieve data by the name of an individual or by some other unique number, symbol, or identifying attribute of the individual?	☒ Yes ☐ No – If NO, go to question 31
30.1	How will the data be retrieved? In other words, what is the identifying attribute (i.e., employee number, social security number, etc.)?	Retrieved thru online query, web server, and batch. Yes, it can be identified by personal identifier – TIN, Warehouse Number, Producer ID, and Name
30.2	Under which Systems of Record (SOR) notice does the system operate? Provide number, name and publication date. (SORs can be viewed at www.access.GPO.gov.)	USDA/FSA-2
30.3	If the system is being modified, will the SOR require amendment or revision?	☐ Yes ☒ No

5 Technology

No.	Question	Response
31	Is the system using technologies in ways not previously employed by the agency (e.g., Caller-ID)?	☐ Yes ☒ No – If NO, the questionnaire is complete.
31.1	How does the use of this technology affect customer privacy?	

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6 Completion Instructions

Upon completion of this Privacy Impact Assessment for this system, the answer to OMB A-11, Planning, Budgeting, Acquisition and Management of Capital Assets, Part 7, Section E, Question 8c is:

1. Yes.

PLEASE SUBMIT A COPY TO THE OFFICE OF THE ASSOCIATE CHIEF INFORMATION OFFICE FOR CYBER SECURITY.